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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

HSRL-6J

Teresa Buchholz
Corps of Engineers, Omaha District
Attn: CEMRO-ED-ED
215 N. 17th Street
Omaha, Nebraska 68102-4978

Dear Ms. Buchholz:

U.S. EPA and Illinois EPA have reviewed the Draft Health and Safety Plan (HSP) and Draft Chemical Data Acquisition Plan (CDAP) prepared by Woodward Clyde for the NL Industries/Taracorp Site in Granite City, Illinois (NL Site). Illinois EPA comments are enclosed with this letter, and U.S. EPA comments are as follows:

Health and Safety Plan

1. Page 3, Section 3.1, first line - If the areas described as north of Granite City are outside of Granite City, Venice, or Madison, we should adjust our description of the Site. The introduction should say the Site is located in and near Granite City, Madison, and Venice. Section 1.2 should also add the words "and near" in the description.
2. Page 3, Section 3.2, line 2 - insert "Taracorp" between "by" and "Trust", and replace "Tri-City Trucking" with "BV&G Transport."
3. Page 3, Section 3.2, second paragraph, first line - the estimate of 40 acres for the main industrial site may be inaccurate.
4. Page 3, Section 3.2, second paragraph, line 2 - replace "Tri-City Trucking" with "BV&G Transport", and replace "SLLRPile" with "Trust 454."
5. Page 3, Section 3.2, second paragraph - This paragraph should not be referring to the Taracorp, Trust 454, and BV&G parcels of property as "sites." This terminology is confusing, since the word "Site" has a different meaning in the superfund context. The word "Site" should only be used when referring to the NL Site as a whole.
6. Page 3, last line - insert "of hard rubber" between "primarily" and "battery."
7. Page 4, first line - delete "partially recycled."

8. Page 4, line 3 - replace "over 100" with "approximately 55."
9. Page 4, line 5 - insert "Venice" between "City" and "and."
10. Page 4, line 6 - insert "NL and" between "the" and "Taracorp."
11. Page 4, second full paragraph - the discussion here is incorrect; it should be the same as that in CDAP page 36, Section 4.2.3.1, first paragraph.
12. Page 4, last paragraph, first line - delete "completed in 1988."
13. Page 4, last paragraph, line 2 - insert ",among other things," between "requires" and "the."
14. Page 4, last sentence - the last sentence should be replaced with the following: "The remediated areas will then be restored to a condition similar to their original state."
15. Page 5, first line - insert "remedial design" between "the" and "site."
16. Page 5, line 2 - replace "levels" with "vertical."
17. Page 6, Section 4.4 - this section should be rewritten as follows: "HAB soil samples will be collected from the "adjacent" residential areas and from the remote fill locations. Two (2) - one (1) ft deep HABs will be collected in each of the 1250 "adjacent" residential lots and three (3) analytical samples collected from each HAB (7500 analytical samples). Two (2) to three (3) HABs at least one (1) ft deep will be collected in each of the 6 unpaved areas identified as remote fill locations in Eagle Park Acres. One (1) analytical sample will be collected from each of the HABs (12 to 18 analytical samples). Two (2) to three (3) HABs at least one (1) ft deep will be collected at the remote fill locations at Sand Road, Schaeffer Road, west of Illinois Rout 3, and 2230 Cleveland Avenue. One (1) analytical sample will be collected from each of the HABs (8 to 12 analytical samples). Two (2) HABs will be collected at each of the five Venice Alley locations. One (1) analytical sample will be collected from each of the HABs (10 analytical samples). The analytical samples from residential areas will be analyzed for total lead, and the remaining samples will be analyzed for TCLP lead."
18. Page 6, Section 4.5, first eight sentences - these sentences should be rewritten as follows: "Soil borings will be drilled at the Trust 454 property, BV&G Transport property, Rich Oil property, Venice, Eagle Park Acres, and three remote fill areas. Ten (10) -10 ft deep borings will be drilled in the unpaved areas of the Trust 454 property, and five (5) - 10 ft deep borings will be drilled in unpaved areas of the BV&G Transport property and Rich Oil property. Five (5) analytical samples will be collected from each boring at 2 ft intervals to 10 ft (75 analytical samples). Five (5) fifteen ft deep borings will be drilled in the proposed liner area. No analytical samples will be collected from these

borings. Geotechnical samples will be collected at 2.5 ft intervals to 15 ft depth (30 geotechnical samples). Two to four borings will be drilled in four of the five alleys in Venice and each of the six unpaved areas identified as remote fill areas in Eagle Park Acres."

19. Page 7, first line - the locations of the four monitoring wells must be discussed further by U.S. ACE, U.S. EPA, IEPA, and Woodward Clyde.
20. Page 7, Section 4.7, second sentence - this sentence is confusing.
21. Page 8, fifth line - add an "s" to "MCL."
22. Page 8, sixth line - delete "lead," and ", and arsenic."
23. Page 9, Section 5.3 - it should be noted that a lot of the discussion in this section is probably not relevant to the NL site (i.e. ticks).
24. Page 12, Section 6.1 - "Home Interior Inspections" should be added to the bullet list in this section.
25. Page 17, Section 7.8 - Does the definition of "visitors" include the residents and homeowners? This is a sensitive subject and provisions should be made to accommodate the property owner and residents of the property whenever possible.
26. Page 23, second full paragraph, last two lines - a discussion of the need for using tyvek in the residential areas is needed between U.S. ACE, U.S. EPA, IEPA, and Woodward Clyde.
27. Page 23, Section 8.9 (the first Section 8.9) - a description of the symptoms of exposure would be helpful.
28. Page 24, third paragraph, last sentence; Page 26, first sentence; Page 27, first full paragraph - a discussion of the need for drumming decon fluids is needed between U.S. ACE, U.S. EPA, IEPA, and Woodward Clyde.
29. Page 24, Section 8.9.2, first sentence - it is not necessary to set up a decon area outside each sampling location - there are 1250 residences.
30. Page 29, Section 10.2 - The Site is more than just the location of Taracorp's operations, but includes the residential areas as well.
31. Page 30 - add Section 11.0 - Personnel should not receive final clearance to work at the Site until they meet the health and safety provisions of sections 7.1-7.3.

32. General comment on HSP - A table of abbreviations similar to the table in the Chemical Data Acquisition Plan would be helpful.

Chemical Data Acquisition Plan

1. Glossary - Terms should be used consistently in the RD documents with their previous use in other documents. For example, is "PDFI" the same as the RI or the RD? If so, we should use the same term. Also, the ROD refers to the NL/Taracorp Site as the "NL Site." Lets stay consistent, rather than creating "NLTSS" as a new abbreviation.
2. Page 1, line 4 - insert "Madison, and Venice," between "City" and "Illinois."
3. Page 1, last sentence - delete "Attempt to" and insert "for which access is obtained" between "residences" and "within."
4. Starting with Page 3, General Comment - carry through all relevant changes in the HSP to the CDAP, including CDAP tables and figures (e.g. CDAP Figure 6 must be changed due to reduction in number of geotechnical borings and may need to be changed dependent on the outcome of monitoring well location discussions).
5. Page 3, Section 1.2.2, line 2 - replace "Tri-City Trucking" with "BV&G Transport."
6. Page 4, line 2 - it must be verified that none of the southernmost residential areas are in Venice before this statement can be made.
7. Page 4, line 4 - replace "appears to be" with "is."
8. Page 5, Section 1.3.2, first line - delete "half."
9. Page 6, Section 1.3.4, lines 4, 5, and 6 - delete the first "and" in line 4, insert ", and removal of battery case material from alleys and driveways." after "area" in line 5, and insert "; alleys and driveways will be paved." after "state" in line 6.
10. Page 6, Section 1.3.4, last line - add "; newly created portions of the expanded Taracorp pile will be provided with a bottom liner." at the end of this line.
11. Page 6, Section 1.4, line 2 - replace "corrective" with "remedial."
12. Page 7, first line - insert "and battery case material" between "soil" and "from."
13. Page 7, line 2 - insert ", and removal of battery case material from alleys and driveways." after "respectively."
14. Page 7, Section 1.4.1 - mention Home Interior Inspections in this section.

15. Page 9, first bullet - replace "Taracorp/SLLR" with "NL."
16. Page 12, Section 2.2.2.2., second bullet - the necessity of particle size and sorting analysis must be discussed between U.S. ACE, U.S. EPA, IEPA, and Woodward Clyde.
17. Page 13, Section 2.2.3.3., first bullet - same as above comment.
18. Page 24, Section 3.2 - Is it possible for the Army Corps to subcontract to local firms? One of the experiences the OSC from the Mardjol Site shared with us in Boulder was that he found that local contractors do a better job, because it is their community and they have to live near the people whose homes they are working on.
19. Page 27, Section 4.0 - The first two sentences should be rewritten so that it is clear that the RI/FS was adequate for its intended purpose, but that additional work is needed for RD. Rewrite this to read "The remedial design will require field work to supplement the data presented in the RI/FS reports (O'Brien and Gere, 1989) prepared for the NL Site. Information necessary for remedial design includes:
 - Additional information regarding the horizontal and vertical extent of soil contamination necessary to further define or document the estimated quantities of material to be removed.
 - Additional remote fill locations have been identified by U.S. EPA where solid rubber...
 - Public hearings...

End the bullets here and continue the main paragraph, starting with "The following..."
20. Page 28, Section 4.1.2 - the necessity of all elements in this section must be discussed between U.S. ACE, U.S. EPA, IEPA, and Woodward Clyde.
21. Page 30, Section 4.1.5 - We may want to prepare a summary of the results of the home interior inspections and provide this summary to all residences in the zone of contamination. Although many of these residents may not give us access to inspect their home, the summary may prove both useful, relevant, and good public relations. While we are not requiring consent for inspecting their home, we are requiring access to remediate soils and these people may benefit from additional information regarding the risk of lead contamination and methods to reduce their risk.
22. Page 30, Section 4.1.5, line 4 - insert ", along with recommended ways to reduce exposure to this contamination." after "household."
23. Page 32, last paragraph - the meaning of the first sentence in this paragraph is unclear.

24. Page 34, second full paragraph - delete this paragraph.
25. Page 35, Sections 4.2.2.2 and 4.2.2.3 - disposal of soil cuttings must be discussed between U.S. ACE, U.S. EPA, IEPA, and Woodward Clyde.
26. Page 36, line 5 - add "with the exception of alleys and driveways, which will be excavated based on a visual criteria, backfilled, and paved." to the end of this line.

Please transmit these comments to Woodward Clyde. I look forward to our upcoming meeting to discuss the comments on the draft HSP and draft CDAP.

If you have any questions concerning this letter, please contact me at (FTS or 312) 886-4742.

Sincerely,

Brad Bradley
Remedial Project Manager

Enclosure

cc: Steve Davis, IEPA

bcc: B. Kush, IL/IN Unit 3
S. Siegel, 5CS-TUB-03



217/782-6760

Refer to: L1190400007-Madison
Taracorp/NL Industries
Superfund/Technical Reports

September 22, 1991

Mr. Brad Bradley
Remedial Project Manager (5HS-11)
U.S. EPA - Region 5
230 S. Dearborn
Chicago, Illinois 60604

Dear Mr. Bradley:

The IEPA has finished its review of the Draft Chemical Data Acquisition Plan (with Appendices) and the Draft Health and Safety Plan (dated August 1991; received 8/23/91). We offer the following comments:

DRAFT CHEMICAL DATA ACQUISITION PLAN-

1. Page 4: The words "small" and "moderate" are qualitative terms. Quantitative terms which delineate the size of the homes and lots would be more useful.
2. Page 28: In addition to notifying the IEPA of initial resident contact, copies of the "communication material" should be submitted to IEPA prior to its release to the public.
3. Page 35: As stated in an earlier correspondence (6/1/91), monitoring wells should be registered with the Illinois Department of Public Health (IDPH). Stainless steel should be the material in the saturated zone instead of PVC, since the groundwater is being sampled for volatiles. If a well is abandoned, then IDPH should be notified and the proper documentation should be filed with them.
4. Page 35: Some of the wastes will be regulated by the Resource Conservation and Recovery Act, (IEPA delegated program), which is defined within the Illinois Environmental Protection Act, (ACT). Within the ACT, RCRA wastes are further defined in: Title 35: Environmental Protection. Subtitle G: Waste Disposal, chapter I: Pollution Control Board - Volumes I through IV. Obviously not all parts of Subtitle G will be applicable as an ARAR to this particular situation; however, any activities related to regulated wastes generated, stored at or removed from this site are required to comply with Subtitle G. The particular areas which should be addressed are:
 - a. Subtitle G, parts 721 and 808 which defines Characteristically Hazardous Waste and Special Waste, respectively.

- b. Standards Applicable to Generators of Hazardous Waste (Subtitle G, Part 722)
- c. Standards Applicable to Transporters of Hazardous Waste (Subtitle G, Part 723)
- d. Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities (Subtitle G, Part 724)
- e. Disposal of Decontamination of Equipment, Structures and Soils (Subtitle G, Part 725.214)
- f. Special Waste Hauling (Subtitle G, Part 809).

DRAFT HEALTH AND SAFETY PLAN-

1. Attached is a thorough review by our Agency's health and safety officer. His comments should be addressed.

If you have any questions, please call Mr. Tracy Fitzgerald at the above number.

Sincerely,



Shirley Baer, Project Manager
Federal Sites Management Unit
Remedial Project Management Section
Division of Land Pollution Control

Enclosure

cc: Division File
Tracy Fitzgerald
Steve Davis
Charlie Zeal/Eric Minder
Jeff Niemann, OCS
Connie Sullinger, OCS



DATE: September 18, 1991

TO: Shirley Baer

FROM: James O'Brien *JS*

By: J. Niemann *JN*

SUBJECT: Site Safety Plan

Ref. Taracorp/NL Industries
Madison County

Caveat

The health and safety protocols established in the Site Safety Plan are based on the site conditions and chemical hazards known and/or anticipated to be present from available site data. The possibility of undocumented disposal within the site requires a conservative approach to on-site safety procedures. The following site safety plan review is predicated solely for use during the proposed activities described in the site investigation work plan. Since specifications herein are subject to review and revision based on actual conditions encountered in the field during site characterization activities, the Agency can only review the document for completeness with OSHA 29 CFR 1910.120(b)(4)(ii) A through J. Therefore, acceptance of the original or any final revision does not imply either approval or disapproval of the SSP.

It should also be noted that all auxiliary operations and equipment which may be on-site but not covered specifically in the site safety plan, must comply with applicable parts of OSHA 29 CFR 1910 and 1926.

Review Detail

INTRODUCTION

A summary of site operations does not include any information regarding excavations though information has been provided in Attachment 6 for this job task.

A summary of representative sample results has not been provided for either the residential or remote areas.

Soil type and topography have not been provided.

A. SAFETY AND HEALTH ANALYSIS

Drill rig safety procedures are needed and have not been provided.

B. EMPLOYEE TRAINING

The pre-entry safety briefings should include a discussion on the health hazards (both through inhalation and ingestion) of lead.

A brief description of the 40 hours of safety training has not been provided.

C. PERSONAL PROTECTIVE EQUIPMENT

The levels of protection should not only reflect the job task but also the concentrations of lead in the work zone. The problem with the Taracorp site is that the concentrations of lead vary greatly with location. Therefore, the area should be divided into smaller exclusion zones and a level of protection assigned for each job task within that particular zone.

Tyvek coveralls should be a requirement for Level D in order to prevent the migration of lead dusts into a home environment.

D. MEDICAL SURVEILLANCE

A brief description of the medical surveillance program has not been provided nor the frequency of examinations.

Specialized medical monitoring (weekly blood lead levels) is needed during site operations and has not been addressed.

There is no evidence provided that employees have been deemed by a licensed physician to be physically fit to perform their duties while wearing respiratory equipment.

The Plan does not state that employees have been informed of their right to access their medical records.

No information has been provided to indicate whether the first aid kits meet the requirements of 29 CFR 1926.50.

E. AIR MONITORING/ENVIRONMENTAL SAMPLING

The proposed air monitoring protocol is not appropriate nor consistent with the types of contaminants potentially present. Since personal monitoring will be used for determining action levels, it is necessary to develop a sampling plan that reflects not only the various job tasks but also the differences in concentrations of lead in the soil.

F. SITE CONTROL

The zones of contamination (i.e.: Exclusion, Contamination Reduction, and Support zone(s)) should also reflect the differences in soil concentrations of lead.

A site map has not been provided.

G. DECONTAMINATION

This section meets the necessary requirements of 29 CFR 1910.120(b)(4)(ii)(G).

H. EMERGENCY RESPONSE PLAN/CONTINGENCY PLANNING

Key personnel in regards to site health and safety have not been established.

The Local Fire Department(s) has not been notified concerning possible site contaminants and site operations.

Individuals who will be on site and trained in First Aid/CPR have not been identified.

I. CONFINED SPACE ENTRY

A confined Space Entry Program needs to be addressed before excavation operations begin.

J. SPILL CONTAINMENT

A written Spill Containment Program does not appear to be necessary for this project. However, this should be clearly stated in the Site Safety Plan.

Conclusion

If you should have any further questions, contact the Health and Safety Unit Staff at 5-0830.